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18 **UNITED STATES DISTRICT COURT**  
19 **CENTRAL DISTRICT OF CALIFORNIA**  
20

21 TC RICH, LLC, a California Limited  
22 Liability Company, RIFLE FREIGHT,  
23 INC., a California corporation,  
24 FLEISCHER CUSTOMS BROKERS, a  
25 sole proprietorship, RICHARD G.  
26 FLEISCHER, an individual, and  
27 JACQUELINE FLEISCHER, an  
28 individual,

Plaintiffs,

v.

29 PACIFICA CHEMICAL,  
30 INCORPORATED, a California  
31 corporation, AQUA SCIENCE  
32 ENGINEERS, INC., a California  
33 Corporation, A/E WEST  
34 CONSULTANTS, INC., a Nevada  
35 Corporation, and DOES 1 through 10,  
36 inclusive,

Defendants.

Case No. CV 15-4878 DMG (AGRx)

*Assigned to the Hon. Dolly M. Gee*

**THIRTEENTH FURTHER JOINT  
QUARTERLY STATUS REPORT  
AS ORDERED BY THE COURT**

Action filed: June 26, 2015  
Discovery: Stayed  
Trial date: None set

Submitted on February 16, 2021

1 Plaintiffs TC RICH, LLC, a California limited liability company, RIFLE  
 2 FREIGHT, INC., a California corporation, FLEISCHER CUSTOMS BROKERS, a  
 3 sole proprietorship, RICHARD G. FLEISCHER, an individual, and JACQUELINE  
 4 FLEISCHER, an individual, and defendant PACIFICA CHEMICAL  
 5 INCORPORATED, and Plaintiff-Intervenor (collectively, the “Parties”) submit this  
 6 Thirteenth Further Joint Status Report.

7 The twelve prior joint reports were filed on:

- 8 1. January 19, 2018 (Dkt. 91);
- 9 2. October 19, 2018 [Dkt. 96];
- 10 3. November 14, 2018 [Dkt. 98];
- 11 4. February 7, 2019 [Dkt. 100];
- 12 5. February 28, 2019 [Dkt. 103];
- 13 6. May 14, 2019 [Dkt. 117];
- 14 7. August 14, 2019 [Dkt. 118];
- 15 8. November 14, 2019 [Dkt. 119];
- 16 9. February 14, 2020 [Dkt. 121];
- 17 10. May 14, 2020 [Dkt. 125];
- 18 11. August 14, 2020 [Dkt. 127]; and
- 19 12. November 16, 2020 [Dkt. 128].

20 The Parties reported in the 12<sup>th</sup> Quarterly Report that on November 11, they  
 21 conducted a telephonic meet and confer to discuss the results of the pilot study and a  
 22 potential return to mediation, as well as other potential paths to resolution. During  
 23 the discussion, counsel for Defendant Pacifica Chemical agreed to solicit bids from  
 24 environmental remediation firms to gauge the cost and willingness of those firms to  
 25 assume responsibility for remediation of the Site. Two neutral consultants analyzed  
 26 the site conditions and generally believed that the cost of cleanup would be in a  
 27 range similar to the recommended removal action alternative presented to DTSC in  
 28 the Removal Action Workplan. Neither company, however, was prepared to

1 guarantee a fixed cleanup price.

2 In the matter of *TC Rich v. Hussain Shaikh* (2:19-cv-02123-DMG-AGR),  
 3 Plaintiffs and Defendant Shaikh filed summary disposition motions that will be  
 4 heard on February 19<sup>th</sup>. The parties anticipate conducting a further meet and confer  
 5 discussion after the Court rules on the cross-motions for summary judgment,  
 6 including whether a return to mediation with Tim Gallagher will be helpful to  
 7 resolve the remaining issues.

8  
 9 Dated: February 12, 2021

**RAINES FELDMAN LLP**

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 11 /s/ John S. Cha

12 John S. Cha

13 Counsel for Plaintiffs

14 Dated: February 12, 2021

**PILLSBURY WINTHROP SHAW  
 PITTMAN LLP**

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 16  
 17 /s/ Mark Elliott

18 Mark Elliott

19 Counsel for Plaintiffs

20 Dated: February 12, 2021

**PALADIN LAW GROUP® LLP**

21  
 22  
 23 /s/ Bret A. Stone

24 Bret A. Stone

25 Counsel for Defendants Pacifica Chemical,  
 26 Incorporated  
 27  
 28

1 Dated: February 12, 2021

**FOLEY & LARDNER LLP**

2  
3 /s/ Sarah Slack

4 Sarah A. Slack

5 Counsel for Plaintiff-Intervenor  
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